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March 23, 2022

Via Email

Hon. Katherine Polk Failla  
District Court Judge  
United States District Court for the Southern  
District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Three Brothers Trading, LLC v. Generex Biotechnology Corp., Case No.  
18-cv-11585 (KPF)  
SACS No.: 1034-00001

Dear Judge Failla:

We would first like to sincerely apologize to the court for the delay in responding to its inquiry regarding the account for the Receivership Assets.

Since we submitted the proposed receivership order last week, we have had ongoing discussions with the other creditors with an eye towards an intercreditor agreement. Unfortunately, the discussions have resulted in the need to submit a new proposed order to accurately reflect the fact that we have been unsuccessful in reaching any such agreement with Oasis Capital and BHP.

To that end, please find attached to this letter both a clean and a redline version of the new proposed order (Ex. A, Ex. B). Once again, we apologize that this process has proven more difficult and contentious than anticipated.

Sincerely,

/s John F. Watkins

John F. Watkins, Esq.

**COFFEY MODICA O'MEARA**